

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**IN RE: KODY DEMETRIUS TATE,
DEBTOR(S)**

**CASE NO. 18-27636
CHAPTER 13**

HOPE FEDERAL CREDIT UNION

MOVANT

VS.

**KODY DEMETRIUS TATE, Debtor(s);
and GEORGE W. STEVENSON, Trustee**

RESPONDENTS

OBJECTION TO CONFIRMATION

Comes now Hope Federal Credit Union, a secured creditor of the above named Debtor(s), and a party in these proceedings, (hereinafter "Movant"), by and through its attorneys, Wilson & Associates, P.L.L.C., and for its Objection to Confirmation of the Chapter 13 plan proposed herein by the Debtor(s), Kody Demetrius Tate, states:

1. Movant is the servicer of a promissory note, which is secured by a Deed of Trust covering the property, commonly known as 5101 Gold Stream Lane, Memphis, TN 38125.
2. Pursuant to 11 U.S.C. §1324, Movant objects to said Chapter 13 plan because the Debtor has listed the ongoing payment date as January 1, 2018. The Debtor should amend his plan to show the correct ongoing payment date.
3. Therefore, the plan does not meet all of the requirements for confirmation.

WHEREFORE, Movant objects to confirmation of the Chapter 13 plan proposed herein by the Debtor(s), and prays that this Court deny such confirmation, for its attorney's fees herein and for all other just and proper relief.

Respectfully Submitted,

WILSON & ASSOCIATES, P.L.L.C.

/s/ Michael G. Clifford

Joel W. Giddens (016700)
James Bergstrom (20622)
Heather Martin-Herron (032248)
Angela Boyd Mathews (033125)
Michael G. Clifford (028691)
Jodie Thresher (025730)

5050 Poplar, Suite 1015
Memphis, TN 38157
(901) 578-9914

Attorneys for Movant

CERTIFICATE OF SERVICE

On October 3, 2018, a copy of the foregoing was served via electronic mail, upon:

Brian Lynn
Attorney at Law
PO Box 111064
Memphis, TN 38111-1064

George W. Stevenson
Trustee
5350 Poplar Avenue, Suite 500
Memphis, TN 38119

and sent via first class mail to:

Kody Demetrius Tate
Debtor(s)
5101 Gold Stream Lane
Memphis, TN 38125

/s/ Michael G. Clifford

Joel W. Giddens (016700)
Heather Martin-Herron (032248)
Angela Boyd Mathews (033125)
James Bergstrom (20622)
Michael G. Clifford (028691)
Jodie Thresher (025730)

W&A. 314250